



U.S. Department of Justice

United States Attorney
Southern District of New York

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

June 14, 2022

BY ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Ronald Rogers, Anauncia Rogers*, 22 Cr. 321 (JMF)

Dear Judge Furman:

The Government writes in advance of the arraignment and initial conference in this matter that is scheduled for June 30, 2022, at 3 p.m. Although the 70-day trial clock under the Speedy Trial Act does not begin to run until arraignment, *see United States v. Nixon*, 779 F.2d 126 (2d Cir. 1985), the Government nevertheless requests the express exclusion of time in the interests of justice pursuant to 18 U.S.C. § 3161(h)(7) from today's date until June 30, 2022. The interests served by such an exclusion outweigh the public and the defendants' interest in a speedy trial because an exclusion will allow the Government to begin gathering and producing and will ensure the effective representation of counsel in light of difficulties in attorney-client communication occasioned by the COVID-19 pandemic. Counsel for the defendants consent to the requested exclusion.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: 
Matthew J. King
Assistant United States Attorney

Cc: Ian Marcus Amelkin, Esq. (via ECF)
Judy Fleming, Esq. (via email)